

## Scoping Process Coordination

**ITEM D-1**            To:    Rodger A. Smith, IDOT District 6  
                         From:   Dennis L. Kennedy, IDOT Division of Water Resources  
                         Date:   June 20, 1995

**ITEM D-2**            To:    IDOT, District 6  
                         From:   Steve Hamer, IDOC (now IDNR)  
                         Date:   June 22, 1995

**ITEM D-3**            To:    James L. Easterly, IDOT District 6  
                         From:   Richard C. Nelson, USFWS  
                         Date:   June 26, 1995

**ITEM D-4**            To:    James L. Easterly, IDOT District 6  
                         From:   Mike MacMullen, USEPA  
                         Date:   June 28, 1995

**ITEM D-5**            To:    Rodger A. Smith, IDOT District 6  
                         From:   Roger K. Wiebusch, US Coast Guard  
                         Date:   August 8, 1995



# Illinois Department of Transportation

Division of Water Resources  
3215 Executive Park Drive / P.O. Box 19484 / Springfield, Illinois / 62794-9484

June 20, 1995

SUBJECT: U.S. 67 Expressway Design Study  
Jacksonville to Macomb

Mr. Rodger A. Smith  
Program Development Engineer  
Illinois Department of Transportation, District 6  
Bureau of Program Development  
126 E. Ash Street  
Springfield, Illinois 62704-4792

Dear Mr. Smith:

Thank you for your May 24, 1995 invitation to a scoping meeting for the subject project. Since we will be unable to have a representative at the meeting, this letter is being sent to provide information regarding our area of jurisdiction.

Enclosed for your information are our Part 700 and Part 704 rules for construction in floodway of streams and regulation of public waters.

Division of Water Resources permits are required for construction in the floodway of streams serving a tributary area of one square mile or more in urban areas or ten square miles of more in rural areas. The general standards for bridges and culverts are listed in Section 700.70 of the rules. The standards for other types of work, such as construction of roadway embankments longitudinally along a stream, are listed in Section 700.60.

The project will apparently involve construction within the Illinois River and its backwaters. Please note in Section 704.70 of our public waters rules that placement of fill material in public waters is allowed only for certain purposes.

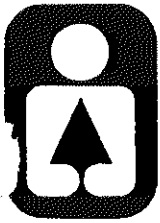
Thank you again, for providing the opportunity for our input on the study. Please feel free to contact Mike Diedrichsen of my staff at 217/782-3863 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dennis L. Kennedy'.

Dennis L. Kennedy, P.E.  
Senior Water Resources Engineer

DLK:MLD:cm  
Enclosure



Illinois  
Department of  
Conservation  
life and land together

# memorandum

to: Illinois Dept. of Transportation, District 6

from: Steve Hamer, Transportation Review Program, Impact Analysis Div.  
S.H.

date: June 22, 1995 reference:

subject: U.S. 67 Expressway Design Study, Jacksonville to Macomb Scoping Meeting

## Agency and Public Comments

The IDOC has strong concerns that IL. Natural Areas Inventory sites (INAI) and wetlands such as Beardstown Marsh be avoided because of their unique and high quality of flora and fauna, some of which are state of Illinois endangered and threatened species. These INAI sites are "worthy of strict protection measures" and the construction of new alignments for existing roads and bridges that would impact these sites is not in keeping with these measures. The IL. Dept. of Conservation strongly urges avoiding impacts to these areas and consider alternate alignments to avoid these areas.



IN REPLY REFER TO:

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Rock Island Field Office (ES)

4469 - 48th Avenue Court

Rock Island, Illinois 61201

COM: 309/793-5800

FAX: 309/793-5804

June 26, 1995

Mr. James L. Easterly, P.E.  
 Illinois Department of Transportation  
 Division of Highways, District 6  
 126 East Ash Street  
 Springfield, Illinois 62704-4792

Dear Mr Smith:

This responds to your letter of May 24, 1995, requesting our comments concerning the Illinois Department of Transportation intentions to study improvements of US 67 from Jacksonville to Macomb. In addition to providing our comments to you in this letter, Tim Romanski, a biologist from my staff was also attended the scoping meeting on June 22, 1995 in Beardstown.

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. Therefore, we are furnishing you the following list of species which may be present in the concerned area:

| <u>Status</u> | <u>Common Name</u>       | <u>Scientific Name</u>              | <u>Habitat</u>   |
|---------------|--------------------------|-------------------------------------|--|
| Endangered    | Indiana bat              | <i>Myotis sodalis</i>               | Caves, mines;<br>small stream<br>corridors with<br>well developed<br>riparian woods;<br>upland forests   |
| Endangered    | Bald eagle               | <i>Haliaeetus<br/>leucocephalus</i> | Undisturbed<br>areas near<br>large rivers<br>and lakes   |
| Threatened    | Decurrent<br>false aster | <i>Boltonia decurrens</i>           | Disturbed<br>alluvial <del>soils</del><br>District 6<br>PROGRAM DEVELOPMENT<br>alluvial <del>soils</del> |

The endangered Indiana bat (*Myotis sodalis*) is listed as occurring Cass and McDonough Counties, Illinois, and may potentially occur in Morgan and Schuyler Counties. During the summer, the Indiana bat frequents the corridors of small streams with well developed riparian woods as well as mature upland forests. It forages for insects along the stream corridor, within the canopy of floodplain and upland forests, over clearings with early successional vegetation (old fields), along the borders of croplands, along wooded fencerows, and over farm ponds and in pastures. It has been shown that the foraging range for the bats varies by season, age and sex and ranges up to 81 acres (33ha). It roosts and rears its young beneath the loose bark of large dead or dying trees. It winters in caves and abandoned mines.

An Indiana bat maternity colony typically consists of a primary roost tree and several alternate roost trees. The use of a particular tree appears to be influenced by weather conditions (temperature and precipitation). For example, dead trees found in more open situations were utilized more often during cooler or drier days while interior live and dead trees were selected during period of high temperature and/or precipitation. It has been shown that pregnant and neonatal bats do not thermoregulate well and the selection of the roost tree with the appropriate microclimate may be a matter of their survival. The primary roost tree, however, appears to be utilized on all days and during all weather conditions by at least some bats. Indiana bats tend to be philopatric, i.e. they return to the same roosting area year after year.

Suitable summer habitat in Illinois is considered to have the following characteristics within a 1/2 mile radius of the project site:

- 1) forest cover of 15% or greater;
- 2) permanent water;
- 3) one or more of the following tree species 11 inches diameter at breast height (dbh) or greater: shagbark and shellbark hickory that may be dead or alive, and dead bitternut hickory, American elm, slippery elm, eastern cottonwood, silver maple, white oak, red oak, post oak, and shingle oak with slabs or plates of loose bark;
- 4) at least 1 potential roost tree per 2.5 acres;
- 5) potential roost trees must have greater than 10% coverage of loose bark (by visual estimation of peeling bark on trunks and main limbs).

If the project site contains any habitat that fits the above description, it may be necessary to conduct a survey to determine whether the bat is present. If Indiana bats are known to be present, they must not be harmed, harassed or disturbed when

present. [for small tree clearing projects...] Indiana bat habitat may be altered (i.e trees cleared) only between the dates of September 1 and April 30.

If the project site contains any habitat that fits the above description, it may be necessary to conduct a survey to determine whether the bat is present. If Indiana bats are known to be present, they must not be harmed, harassed or disturbed when present. Minor alterations of Indiana bat habitat (i.e. clearing) may be accomplished between the dates of September 1 and April 30. Large-scale habitat alterations within known or potential Indiana bat habitat should not be permitted without a bat survey and/or Section 7 consultation.

The endangered bald eagle (*Haliaeetus leucocephalus*) is listed as wintering and has known night roosts in the Cass, Morgan, and Schuyler Counties, Illinois. During the winter, this species feeds on fish in the open water areas created by dam tailwaters, the warm water effluents of power plants and municipal and industrial discharges, or in power plant cooling ponds. The more severe the winter, the greater the ice coverage and the more concentrated the eagles become. They roost at night in groups in large trees adjacent to the river in areas that are protected from the harsh winter elements. They perch in large shoreline trees to rest or feed on fish. Night roosts are known to exist in Morgan and Schuyler Counties. There is no critical habitat designated for this species in Illinois and the only restrictions that apply to the eagle are that it not be harassed, harmed or disturbed when present.

The decurrent false aster (*Boltonia decurrens*) is listed as threatened and known to occur in Cass, Morgan, and Schuyler Counties, Illinois. It occupies disturbed alluvial soils in the floodplains of the Illinois River. There is no critical habitat listed for this species in Illinois. Federal regulations prohibit any commercial activity involving this species or the destruction, malicious damage or removal of this species from Federal land or any other lands in knowing violation of State law or regulation, including State criminal trespass law. This species should be searched for when suitable habitat exists.

More specifically, the *B. decurrens* is documented as occurring adjacent to current US 67 immediately west of the bridge approach in the City of Beardstown. Fifty individuals were located at this site in 1992, and 6 individuals in 1994. A survey should be conducted at this site in 1995 and 1996 to determine the plant's status. Depending on the results of these investigation it may be necessary for your agency to enter into formal consultation with the Service.

According to the regulations for interagency consultation (50 CFR Part 402), your agency must enter into consultation with the Fish and Wildlife Service whenever (a major Federal construction activity is contemplated and a listed species or critical habitat is present...OR...a Federal activity is contemplated that may affect a listed species or its critical habitat). The action agency, or its designated representative, has the option of entering formal consultation directly, or informal consultation which is designed to aid the agency in determining if formal consultation is required. (In the first case...) The action agency must (in the second case....may) prepare a Biological Assessment discussing the project and potential impacts to the listed species.

When preparing a Biological Assessment, the following steps should be taken. One or more of these steps may have already been completed.

1. Conduct an on-site inspection of the area affected by the proposed activity or program. This may include a detailed survey to determine if species are present and whether suitable habitat exists for either expanding the existing population or potential reintroduction of populations.
2. Interview recognized experts on the species at issue, including those within the Fish and Wildlife Service, State conservation department, universities and others who may have data not yet found in scientific literature.
3. Review literature and other scientific data to determine the species' distribution, habitat needs and other biological requirements.
4. Review and analyze the effects of the proposal on the species in terms of individuals and populations, including consideration for the cumulative effects of the proposal on the species and its habitat.
5. Analyze alternative actions that may provide conservation measures.

The action agency must determine if its action is likely to adversely affect the listed species or not. If it is not likely to adversely affect the listed species, the project may be exempted from formal consultation provided the Fish and Wildlife Service concurs with this determination. The proposed action may also be exempt from formal consultation if the agency agrees to implement measures that avoid adverse effects to listed species, effectively making the action a 'no effect' or 'beneficial effect'. If the action is likely to adversely affect the listed species, then formal consultation must be initiated.

We must point out that Section 7(d) of the 1978 Amendment to the Endangered Species Act underscores the requirement that the Federal agency (or any applicant) shall not make any irreversible or irretrievable commitment of resources during the consultation period which, in effect, would deny the formulation or implementation of reasonable alternatives regarding its actions on any endangered or threatened species.

This project also has the potential to adversely affect several wetlands located in several areas adjacent within the proposed corridor. All efforts should be made to avoid this areas if at all possible. The Service is willing to work early on in this process with IDOT in selecting alignment alternatives that have the least impact to wetlands, endangered species, and other fish and wildlife habitats. Mitigation sites, if necessary, should be chosen for their potential to replace, in-kind, the types and sizes of wetlands anticipated to be impacted by the proposed project.

Sections of the Illinois River immediately upstream and downstream of the existing US 67 bridge have historically been chronic dredging sites for the U.S. Corps of Engineers. In the past the Corps has dredged sand from this stretch of river on almost a yearly basis. The Corps in cooperation with the Service, Illinois Department of Conservation, the IDOT Division of Water Resources, the Illinois Environmental Protection Agency, and the Illinois Department of Agriculture are in the process of developing a long-term plan for dredged material placement for this section of river. The current recommendations are that the Corps lease or purchase land within existing leveed areas in order to develop stockpile sites for dredged material. If this sand is of suitable quality and can be used by the IDOT for during the construction of US 67, we recommend that discussions between the Corps and IDOT occur early in the planning process. Such an arrangement could be mutually benefiting for both agencies; IDOT would have a supply of sand close to construction activities and the Corps could prolong the life of their confined disposal sites by allowing IDOT to remove the sand for construction purposes. Accordingly, Mr. Mike Cox, USAOE-RID, should be contacted by IDOT to discuss in details this opportunity. Mr. Cox's telephone number is (309) 794-5558.

This letter provides comments under the authority of and in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.); and the Endangered Species Act of 1973, as amended.

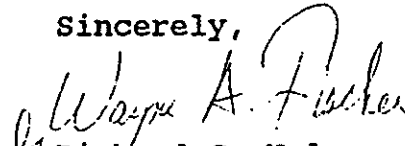


Mr. James L. Easterly, P.E.

6.

If you have any questions concerning our comments, please contact Mr. Tim Romanski of my staff.

Sincerely,

  
Richard C. Nelson  
Field Supervisor

cc: USEPA (Winn)  
ILEPA (Yurdin)  
ILDOC (Hamer)

TR:am



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

JUN 28 1995

REPLY TO THE ATTENTION OF:

James L. Easterly, P.E.  
 District Engineer  
 Illinois Department of Transportation  
 Division of Highways, District 6  
 126 East Ash Street  
 Springfield, Illinois 62704-4792

Attn: Roger Smith

Dear Mr. Easterly:

We have reviewed the Scoping Document for the U.S. 67 Corridor Study from Jacksonville to Macomb, Illinois. The proposed action involves the construction of approximately 55 miles of a 4-lane expressway connecting Jacksonville to Macomb via Beardstown. The proposed project is located in Morgan, Cass, Schuyler, and McDonough Counties. An Environmental Impact Statement (EIS) is being prepared for this project. We were unable to attend the scoping meeting that took place on June 22, 1995 at the Elks Lodge in Beardstown, Illinois. We offer the following comments for consideration during EIS preparation.

The purpose and need for the proposed action should be well documented. To justify safety concerns, the accident rate on the existing U.S. 67 should be compared on a state and national level. Economic and employment characteristics should be adequately discussed as well as any other pertinent information.

All feasible alternatives must be analyzed. Under the National Environmental Policy Act (NEPA), EIS's serve as the means of assessing the environmental impacts of proposed agency actions, rather than justifying decisions already made. Actions to be considered include the No-build Alternative and Transportation System Management (TSM) in addition to a variety of Build Alternatives. In the absence of an objective and thorough alternatives analysis, the EIS process tends merely to affirm a chosen action and loses power as a decision-making tool. It is generally not sufficient to discuss only alternatives within an action, such as using different designs or materials, or changing the orientation of the facility slightly within the project boundaries. To do so would be a violation of NEPA.

According to the scoping document, direct, secondary, and cumulative impacts will be analyzed for each resource identified



in the document within the study area. Secondary impacts that should also be adequately discussed in the EIS include how increased development pressures facilitated from a 4-lane expressway will impact the surrounding environment. Projected land used changes should be identified along with any related mitigation measures. In addition, a complete discussion of cumulative impacts should be included in the EIS. Cumulative effects as defined in 40 CFR Part 1508.7 are "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future action regardless of what agency (federal or non-federal) or person undertakes such other actions." Cumulative impacts can result from individually minor, but collectively significant, actions taking place over time. The EIS should include a discussion on other projects in the vicinity of the proposed action that would result in cumulative impacts.

The EIS must demonstrate avoidance and minimization measures to minimize adverse impacts on sensitive and ecologically important ecosystems or species. This includes items identified in the scoping document such as the sand plains ecology of the Illinois River, natural areas in the Beardstown area (marshes, prairies, etc.), federal and state-endangered species, 4(f) and 6(f) lands, and wetland and other aquatic impacts including floodplains. Consultation should be initiated with the U.S. Fish and Wildlife Service regarding any endangered or threatened species in the project area.

Section 404 (b)(1) guidelines of the Clean Water Act require that wetland impacts must be avoided or minimized, and compensation be provided for any unavoidable impacts. We generally recommend that a minimum of 1.5 acres of compensatory wetland be provided for each acre of naturally occurring wetland that is unavoidably lost. Forested wetlands should be compensated for at a ratio of 2:1. The compensatory wetlands should be located as close as possible to the area where the project-related impacts are likely to occur, and should be designed to replicate, as closely as possible, the types, functions, and values of the impacted wetlands. Where feasible, the compensatory wetlands should be provided by the process of restoration. If restoration proves infeasible, compensation should be provided by the process of creation.

Adequate compensation should be provided for any vegetation removed. After construction, all disturbed areas should be sodded or seeded. We recommend replanting with native plant species. They are more cost-effective than nonnatives because they are adapted to the local environment, and therefore require minimal maintenance and do not require the use of pesticides or fertilizers. Native species also enhance local biodiversity. In addition, we recommend that removed trees be replaced with native saplings at a minimum ratio of 1:1, and that they be placed as close as possible to the impacted areas. This would provide erosion control, increase drainage capacity, mitigate loss of

habitat, and improve aesthetics.

Air quality information must be supplied in the EIS. Air quality modeling should be completed, and the findings should be included in the EIS.

A search for any known sources of contamination such as underground storage tanks (USTs) must be completed. Environmental Site Assessments should be conducted for any suspect contamination within the right-of-way of the proposed expressway. Any USTs located within the project alignment should be removed. Regulations for their removal and disposal are listed under 40 CFR Subpart G.

Mitigation measures to prevent erosion should be implemented during project implementation. Best Management Practices should be utilized. Such measures include the use of sediment barriers such as silt fences and hay bales, staging of grading operations so that adequate control of erosion and siltation can be maintained, and prompt revegetation following grading.

Construction activities may degrade air quality due to an increase in dust and equipment exhaust. Noise from construction equipment may adversely impact the surrounding community. The contractor should be required to install control devices and employ prescribed control methods to minimize any adverse impacts.

We appreciate the opportunity to provide comments on this project. If you have any questions, or if we can be of further assistance, please contact Amy Nerbun at (312) 886-3512.

Sincerely,



Mike MacMullen, Senior Environmental Scientist  
Planning and Assessment Branch  
Planning and Management Division

U.S. Department  
of Transportation  
**United States  
Coast Guard**



Commander  
Second Coast Guard District

1222 Spruce Street  
St. Louis, MO 63103-2832  
Staff Symbol:  
Phone: (ob)  
314-539-3724

16590  
8 August 1995

Mr. Rodger A. Smith  
Illinois Department of Transportation  
District 6  
Bureau of Program Development  
126 East Ash Street  
Springfield, IL 62704-4792

Subj: US 67 CORRIDOR STUDY; POTENTIAL REPLACEMENT/ALTERATION OF  
BEARDSTOWN HIGHWAY BRIDGE, MILE 87.9, ILLINOIS WATERWAY

Dear Mr. Smith:

Although we were unable to attend the scoping meeting held concerning proposed improvements to US 67 between Jacksonville and Macomb, the Coast Guard is very interested and concerned about the project.

Based on the documents submitted with your letter, it appears that part of the subject project will include the construction of a new bridge or alteration of the existing bridge across the Illinois Waterway at Beardstown. Either of these actions will require a Coast Guard bridge permit. Although our main area of concern is the navigational clearances the bridge must provide, the permit application must be supported by the appropriate environmental document required by the National Environmental Policy Act (NEPA).

Enclosed is a copy of our pamphlet "Applications for Coast Guard Bridge Permits". It should help explain our permit and NEPA requirements. I encourage early coordination between our offices to establish navigational requirements and ensure the environmental document adequately covers all our requirements. Please contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roger K. Wiebusch".

ROGER K. WIEBUSCH  
Bridge Administrator  
By direction of the District Commander

Encl: Pamphlet